

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

GERALYN JABLONSKI,  
on behalf of plaintiff and the classes defined  
below; and  
PEOPLE OF THE STATE OF ILLINOIS ex rel.  
GERALYN JABLONSKI,

Plaintiffs,

vs.

RIVERWALK HOLDINGS, LTD.,  
RIEXINGER & ASSOCIATES, LLC,  
and BAKER & MILLER, P.C.,

Defendants.

No. 11 cv 0840

**BAKER & MILLER, P.C.'S RESPONSES TO REQUEST FOR ADMISSION,  
INTERROGATORIES AND DOCUMENT REQUESTS**

**REQUESTS FOR ADMISSION**

1. The letter attached hereto as Exhibit 1 is a true and accurate copy of a letter sent by Riexinger & Associates LLC on January 12, 2010 to GERALYN Jablonski (except inasmuch as some information has been redacted from the letter, by black marker).

**RESPONSE:** Baker & Miller, P.C. lacks knowledge or information and therefore cannot admit or deny this request for admission.

2. Riverwalk Holdings, Ltd., prior to January 5, 2011, did not hold a collection agency license from the Illinois Department of Financial and Professional Regulation.

**RESPONSE:** Baker & Miller, P.C. admits that it learned in early December 2010 that Riverwalk Holdings, Ltd. did not have a collection agency license from the Illinois Department of Financial & Professional Regulation. Baker Miller P.C. lacks knowledge or information to respond to the remainder of this request.



3. At some point prior to January 12, 2010, Riverwalk Holdings, Ltd. authorized Riexinger & Associates LLC to make an attempt to collect on the alleged debt originated by U.S. Bank.

**RESPONSE:** Baker & Miller, P.C. lacks knowledge or information and therefore cannot admit or deny this request for admission.

4. At some point prior to December 8, 2010, Riverwalk Holdings, Ltd. authorized Baker & Miller P.C. to file a lawsuit, in its name, against Geralyn Jablonski, on an alleged debt originated by U.S. Bank.

**RESPONSE:** Baker & Miller P.C. admits that it was retained prior to December 8, 2010, to file Riverwalk Holdings, Ltd.'s lawsuit against Geralyn Jablonski on a debt originated by U.S. Bank. The remainder of this request is denied.

5. The person who signed Exhibit 1 - Stephen P. Riexinger - is or was at one time a member, director or officer of Crown Asset Management LLC, which was sued in the matter of *Randolph v. Crown Asset Management LLC*, No. 1:08CV3212 (N.D.Ill.).

**RESPONSE:** Baker & Miller, P.C. lacks knowledge or information and therefore cannot admit or deny this request for admission.

6. Stephen P. Riexinger knew about the licensing requirements of the Illinois Collection Agency Act at all times relevant to the pending litigation brought by Geralyn Jablonski.

**RESPONSE:** Baker & Miller, P.C. lacks knowledge or information and therefore cannot admit or deny this request for admission.

7. In sending the letter marked as Exhibit 1 to plaintiff, Riexinger & Associates LLC was acting as a debt collector.

**RESPONSE:** Baker & Miller, P.C. lacks knowledge or information and therefore cannot admit or deny this request for admission.

8. There are more than 50 individuals in Illinois against whom Riverwalk Holdings, Ltd. (directly or through agents or attorneys) filed or threatened suit, between January 6, 2006 and January 26, 2011.

**RESPONSE:** Baker & Miller, P.C. admits that Riverwalk Holdings, Ltd., through Baker & Miller, P.C. as counsel, filed suit against more than 50 individuals in or around November and December 2010. The remaining portion of this request for admission is denied.

9. There are more than 50 individuals in Illinois against whom Riverwalk Holdings, Ltd. (directly or through agents or attorneys) filed or threatened suit, between January 6, 2010 and January 26, 2011.

**RESPONSE:** Baker & Miller, P.C. admits that Riverwalk Holdings, Ltd., through Baker & Miller, P.C. as counsel, filed suit against more than 50 individuals in or around November and December 2010. The remaining portion of this request for admission is denied.

10. There are more than 100 individuals in Illinois against whom Riverwalk Holdings, Ltd. (directly or through agents or attorneys) filed or threatened suit, between January 6, 2006 and January 26, 2011.

**RESPONSE:** Baker & Miller, P.C. admits that Riverwalk Holdings, Ltd., through Baker & Miller, P.C. as counsel, filed suit against more than 100 individuals in or around November and December 2010. The remaining portion of this request for admission is denied.

11. There are more than 100 individuals in Illinois against whom Riverwalk Holdings, Ltd. (directly or through agents or attorneys) filed or threatened suit, between January 6, 2010 and January 26, 2011.

**RESPONSE:** Baker & Miller, P.C. admits that Riverwalk Holdings, Ltd., through Baker & Miller, P.C. as counsel, filed suit against more than 100 individuals in or around November 2010 and December 2010. The remaining portion of this request for admission is denied.

12. There are more than 500 individuals in Illinois against whom Riverwalk Holdings, Ltd. (directly or through agents or attorneys) filed or threatened suit, between January 6, 2006 and January 26, 2011.

**RESPONSE:** Riverwalk Holdings, Ltd., through Baker Miller P.C. as counsel filed less than 500 complaints, therefore this request is denied.

3. Please state your policies and procedures for attempting to collect alleged debts. Your response should include, but not be limited to, general procedures used to collect debts, correspondence and communication with alleged debtors, policies regarding the pursuit of litigation and judgments against debtors (if any), and strategies and tactics used by you make payment by an alleged debtor more likely.

ANSWER: Objection. This interrogatory is overbroad and calls for information unrelated to Ms. Jablonski's case.

4. Please state whether information maintained by you on alleged debtors is searchable or retrievable by computer and, if so, the categories of information that can be searched or retrieved.

ANSWER: Certain electronically stored information (ESI) is available. Baker & Miller P.C. objects to answering this type of question by interrogatory and requests that a follow on meet and confer occur consistent with the protocols set forth by the Seventh Circuit Electronic Discovery Committee.

5. Please state what actions you took in order to attempt collection on the debt allegedly owed by Ms. Jablonski, stating the date, time, form and content of all such debt collection attempts. Your response should include, but not be limited to, any actions taken relating to litigation, or threats to pursue litigation.

ANSWER: Baker & Miller, P.C. was retained to file a lawsuit against Ms. Jablonski in connection with her debt owed to Riverwalk Holdings, Ltd. In connection with its retention, on September 9, 2010, a letter was sent to Ms. Jablonski in connection with her debt owed. On September 28, 2010, a letter was sent to Ms. Jablonski correcting the name of the creditor to Riverwalk. On December 13, 2010, a lawsuit was filed against Ms. Jablonski. Further answering, on December 13, 2010, the lawsuit and summons was placed with a process server for service. On December 15, 2010, the lawsuit and summons was retrieved from the process server. On December 21, 2010, a motion to dismiss was scheduled and mailed to all parties. On January 3, 2011, the case was dismissed. On January 6, 2011, a copy of the dismissal order was mailed to Ms. Jablonski.

**ANSWER:** The requests for admission, in several cases, have asked for admissions on topics not within Baker & Miller P.C.'s knowledge or purview, for instance, the requests related to representation of Riverwalk Holdings, Ltd. by other counsel, requests for information about Riverwalk Holdings, Ltd.'s license, and information about lawsuits filed by Riverwalk Holdings, Ltd. through counsel other than Baker & Miller, P.C. Baker & Miller P.C. denied the requests regarding net worth because Baker & Miller P.C.'s net worth is below the net worth in each of the three requests for admission.

12. Please state the total number, and the identity, of individuals in Illinois against whom Riverwalk Holdings, Ltd. (directly or through agents or attorneys) filed or threatened suit, between January 6, 2006 and January 26, 2011. In your response, identify those who were sued, or threatened with suit, on or after January 6, 2010.

**ANSWER:** Baker & Miller, P.C. objects to the phrase "threatened with suit." Baker & Miller, P.C., responding for itself only, states as follows. Baker & Miller, P.C. was retained to collect certain debts for Riverwalk in 2010. Baker & Miller, P.C. sent letters in compliance with debt collection laws to 346 Riverwalk debtors on or around September 9, 2010. Name change letters were sent to those debtors on or around September 28, 2010. In November and December 2010, Riverwalk filed 214 lawsuits through Baker & Miller, P.C. as counsel. Ninety-nine (99) of those cases were served. All of those suits have been dismissed.

13. Please state your net worth.

**ANSWER:** Baker & Miller will provide this information pursuant to an appropriate protective order.

14. Please state the total amount of money that you collected from persons identified in response to Interrogatory 12.

**ANSWER:** \$10,675.62 was collected by Baker & Miller, P.C. on behalf of Riverwalk Holdings, Ltd.